BEFORE THE WAITANGI TRIBUNAL

WAI 3300
WAI 1194
WAI 1212
WAI 3342
WAI 2494
WAI 2872

IN THE MATTER OF the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF Tomokia ngā tatau o Matangireia - the Constitutional Kaupapa Inquiry **(WAI 3300)**

AND

IN THE MATTER OF a claim by **Colleen Skerrett-White, Timitepo Hohepa**, and **Te Ariki Derek Morehu** on behalf of **Ngāti Te Rangiunuora** who are supported by **Ngāti Pikiao (WAI 1194 and WAI 1212)**

MEMORANDUM OF COUNSEL REGARDING POU TIKANGA EXPERT PANEL

Dated on this 23rd day of April 2026

RECEIVED
Waitangi Tribunal
23 Apr 26
Ministry of Justice
WELLINGTON

ANNETTE SYKES & Co.
barristers & solicitors
8 – Unit 1 Marguerita Street
Rotorua, 3010
Phone: 07-460-0433
Counsel Acting: Annette Sykes / Maia Te Hira / Rangipurei Manley
Email: asykes@annettesykes.com / maia@annettesykes.com / rangipurei@annettesykes.com

AND

IN THE MATTER OF a claim by **Pita Tipene, Moana Maniapoto, George Laking, Veronica Tawhai, Donna Kerridge** and **India Logan-Riley** on behalf of **Ngā Toki Whakarururanga (WAI 3342)**

AND

IN THE MATTER OF a claim by **Donna Awatere-Huata** of Ngāti Porou, Ngāti Whakaue and Ngāti Hine, on behalf of herself and all Māori **(WAI 2494)**

AND

IN THE MATTER OF a claim by **Dr Leonie Pihama, Angeline Greensill, Mereana Pitman, Hilda Halkyard-Harawira** and **Te Ringahuia Hata (WAI 2872)**

TĒNĀ E TE TARAIPIUNARA

Introduction

1. This Memorandum of Counsel is filed on behalf of the following claim and respective claimants:

    1.1 **Wai 1194 and 1212** – a claim by Colleen Skerrett-White, Timitepo Hohepa, and Te Ariki Derek Morehu on behalf of Ngāti Te Rangiunuora who are supported by Ngāti Pikiao;

    1.2 **Wai 3342 –** a claim by Pita Tipene, Moana Maniapoto, George Laking, Veronica Tawhai, Donna Kerridge and India Logan-Riley on behalf of Ngā Toki Whakarururanga;

    1.3 **Wai 2494 –** a claim by Donna Awatere-Huata of Ngāti Porou, Ngāti Whakaue and Ngāti Hine, on behalf of herself and all Māori; and

    1.4 **Wai 2872 –** a claim by Dr Leonie Pihama, Angeline Greensill, Mereana Pitman, Hilda Halkyard-Harawira and Te Ringahuia Hata.

    (**"the Claimants"**)

2. This Memorandum is filed in response to the Tribunal's invitation for claimant counsel to file suggestions of candidates for the pou tikanga expert panel by 21 April 2026[1].

3. Counsel respectfully nominates the following pūkenga for consideration for appointment to the pou tikanga expert panel, in accordance with the criteria confirmed by Chief Judge Fox in memorandum-directions dated 17 April 2026[2].

    a. Dr Hīria Hape

    b. Dr Ēnoka Murphy

    c. Dr Anaha Hiini

4. Each nominee is a fully fluent expert in te reo Māori and tikanga. Counsel respectfully submits that each nominee is impartial and that their inclusion on the panel would not give rise to any legitimate concerns in that regard.

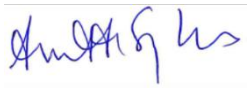
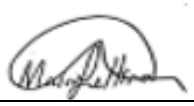
5. We are happy to provide any further information in support of these nominations if that would be of assistance to the Tribunal.

[1] Wai 3300, #2.6.85 at [27].
[2] Wai 3300, #2.6.85 at [27].

6. We apologise for filing this memorandum out of time. Counsel was subject to concurrent filing deadlines in the Wai 3325 climate change inquiry and the Wai 3553 Education and Training Amendment Act inquiry this week.

7. Counsel submits that no prejudice arises to any party as a result of the late filing.

DATED at Rotorua this 23rd day of April 2026

Annette Sykes | Maia Te Hira | Rangipurei Manley

Counsel for the Claimants